

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE:)	CASE NO. 14-11633
)	
CARRIE MEHL)	CHAPTER 7 PROCEEDINGS
)	
Debtor.)	JUDGE JESSICA PRICE SMITH

MOTION FOR TURNOVER OF FUNDS UPON DEBTOR

Now comes Mary Ann Rabin, the duly-appointed Trustee herein, and says that:

1. This matter constitutes a core proceedings under 28 U.S.C. §157(b)(2)(A). This Court has jurisdiction over the parties and subject matter of this Motion pursuant to 28 U.S.C. §§ 57 and 1334. Venue is proper before this Court pursuant to 28 U.S.C. § 1409.
2. This case commenced when Carrie Mehl (the “Debtor”) filed a voluntary petition on March 17, 2014, under Chapter 7 of the Bankruptcy Code. Mary Ann Rabin is the duly appointed Trustee.
3. The Debtor had \$20.00 cash on hand on the date of filing along with \$641.50 in her PNC checking account and \$6,000.30 in her PNC savings account. The total amount of cash that is property of the estate is \$6,661.80.
4. Of that sum, the Debtor is entitled to claim an exemption of \$450.00 under 11 U.S.C. § 2329.66(A)(3), and \$1,225.00 under 11 U.S.C. § 2329.66(A)(18) of the Ohio Revised Code.
5. Trustee is entitled to the immediate possession of the balance of these funds as property of the estate.

WHEREFORE, Trustee prays that the Debtor be directed forthwith to turnover to the Trustee the sum of \$4,986.80, which is the amount of \$6,661.80 less Debtor's exemption in the amount of \$1,675.00.

Respectfully submitted,

/s/Mary Ann Rabin
MARY ANN RABIN (#00000009)
Rabin & Rabin Co., LPA
55 Public Square
1510 Illuminating Building
Cleveland, Ohio 44113
(216)771-8084
Facsimile No. (216)771-4615
mrabin@rabinandrabin.com

SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion was mailed this 28th day of April, 2014 by ordinary U.S. mail, postage prepaid, to:

Carrie Mehl
42781 Galaxy Dr.
Elyria, OH 44035

- Edward A Bailey bknotice@reimerlaw.com, RACJ.ecfndoh@yahoo.com
 - William J Balena docket@ohbksource.com, debra@ohbksource.com
 - Faye Dian English bknotice@reimerlaw.com, RACJ.ecfndoh@yahoo.com
 - Mary Ann Rabin trusteeemail@rabinandrabin.com, mrabin@ecf.epiqsystems.com
 - United States Trustee (Registered address)@usdoj.gov
- (electronic mail service)

/s/Mary Ann Rabin
MARY ANN RABIN